ATTACHMENT F

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

CASE NO. 23-80101-CR-CANNON(s)

UNITED STATES OF AMERICA,

      Plaintiff,

v.

DONALD J. TRUMP,
WALTINE NAUTA, **and**
CARLOS DE OLIVEIRA,

      Defendants.

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GOVERNMENT'S NOTICE OF EXPERT TESTIMONY OF DAVID LOVEALL II

The Government hereby files under Federal Rule of Criminal Procedure 16(a)(1)(G), Local

Rule 88.10(o)(3), and this Court's Order (ECF No. 215) its notice of intent to use the following

expert testimony in its case-in-chief at trial.

David Loveall II, Senior Computer Scientist, Operational Technology Division, Federal Bureau of Investigation

a.   Training and Qualifications

The Government intends to call Federal Bureau of Investigation ("FBI") Senior Computer

Scientist David Loveall II as an expert in electronic evidence and digital media forensics. Mr.

Loveall has worked for the FBI in various capacities in the field of digital forensics since 2000,

including as a Senior Technical Forensic Advisor, Computer Scientist, Digital Forensic Examiner,

and Information Technology Specialist. From December 2013 through the present, he has been

assigned to the Operational Technology Division of the FBI in Quantico, Virginia, where he serves

as a Senior Technical Forensic Advisor. In this capacity, Mr. Loveall advises FBI personnel on

issues related to digital forensics and computer science. Prior to that, Mr. Loveall worked as a digital forensic examiner in the FBI's Kansas City office. During his more than two decades with the FBI, Mr. Loveall has conducted hundreds of digital forensic examinations.

Mr. Loveall holds a Bachelor of Science in Computer Science, Mathematics, and Physics, and a Master of Science in Computer Forensics. He has received extensive professional training and obtained various certifications related to digital forensic analysis and exams, including certifications for FBI Computer Analysis Response Team ("CART") Forensic Examiner, Senior Forensic Examiner, Macintosh Field Examiner, DOS / Windows Field Examiner, and Unix Field Examiner. Since 2014, Mr. Loveall has served as an Adjunct Professor at George Mason University in Fairfax, Virginia, teaching various courses including Advanced Computer Forensics, Windows Registry Forensics, and Linux Forensics. Mr. Loveall is also the recipient of the FBI Director's Award for Outstanding Technical Advancement, the Presidential Early Career Award for Scientists and Engineers for his contributions to the field of digital forensics, and the Intelligence Community Seal Medallion.

Mr. Loveall's qualifications to analyze publicly available data captured from the internet are based on his knowledge, skill, expertise, training, and education, as further described in his curriculum vitae, which was provided to the defense in discovery (USA-01286133 – USA-01286145).

b.   Publications and Prior Testimony as an Expert

Mr. Loveall has not authored any publications in the last ten years. He also has not testified as an expert at trial or by deposition in the last four years, though in July 2023 he submitted a sworn certification responding to a digital forensic analysis report filed by the defense during post-trial litigation in *United States v. Keith Raniere* (18-204-NGG) (E.D.N.Y. 2018).

2

c.   Complete Statement of Testimony/Opinion and Basis

The Government expects that Mr. Loveall will testify, if necessary, as to the authenticity of certain publicly available videos, images, and social media posts captured from the internet—to include some of defendant Trump's speeches, media interviews, and Truth Social posts—that the Government intends to offer into evidence during its case-in-chief at trial.[1] Mr. Loveall will explain the forensic process of digital identification that he used to confirm that such videos, images, and social media posts captured from various publicly available internet websites are reliable, accurate, and unaltered depictions of what was presented on those websites at the time the data was captured.

Mr. Loveall will also explain the methodology and basis for his testimony. For example, he will testify about how website security certificates are used and hash values are generated, as well as how these are leveraged to verify that the forensic image of data captured from a website is an exact match of the data that was presented by the website at the time it was captured. Furthermore, Mr. Loveall is expected to testify about the purpose behind imaging and hash-matching, including explaining how these steps ensure that the data captured from the internet was not damaged, modified, or altered when it was captured, or during any subsequent examination. Additionally, Mr. Loveall will testify about the reliability of the programs he used to parse, examine, and analyze such data.

d.   Approval of Disclosure

Pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G)(v), I have reviewed this

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[1] These would include, for example, videos of the public statements identified in Paragraphs 23 and 37 of the Superseding Indictment (ECF No. 85), which were provided to the defense in discovery. *See* USA-00390664 – USA-00390669.

disclosure and approve of its contents.

Date: January ___, 2024

David Loveall II
Senior Computer Scientist
FBI

4